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International Corporation d/b/a TCS America

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

| | | |
|-------------------------------------|---|-------------------------|
| _____ |) | |
| In re: |) | Chapter 11 |
| |) | |
| DELPHI CORPORATION, <i>et al.</i> , |) | Case No. 05-44481 (RDD) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| _____ |) | |

**JOINDER OF TATA AMERICA INTERNATIONAL CORPORATION
D/B/A TCS AMERICA TO THE LIMITED OBJECTIONS TO MOTION FOR
FINAL DECREE AND ORDER PURSUANT TO 11 U.S.C. §§ 105, 350(a),
AND 1142, FED. R. BANKR. P. 3022, AND LOCAL BANKR. R. 3022-1
CLOSING THE BANKRUPTCY CASES AND PROVIDING RELATED RELIEF**

1. Tata America International Corporation d/b/a TCS America ("Tata"), by its undersigned attorneys, Kelley Drye & Warren LLP, hereby joins in the limited objections to the Reorganized Debtors' Motion for Final Decree and Order Pursuant to 11 U.S.C. §§ 105, 350(a), and 1142, Fed. R. Bankr. P. 3022, and Local Bankr.R. 3022-1 Closing the Bankruptcy Cases and Providing Related Relief (the "Closing Motion") [Docket No. 22073] filed by similarly situated parties (the "Objections").¹

¹ The Objections include without limitation the objections filed at docket numbers 22082 and 22086.

2. Tata is the defendant in adversary proceeding Case No. 07-02668 (RDD) currently pending before this Court. Like several other avoidance action defendants, the plaintiffs and Tata have not yet engaged in discovery, mediation or a Rule 15/Rule 4(m) hearing. For the sake of judicial efficiency and economy, Tata joins in the objections and objects to the Closing Motion to the extent it will prejudice Tata's rights with respect to timing and due process, obtaining discovery, and/or fully asserting all of its defenses, both in its pending adversary case and any potential appeal.

WHEREFORE, Tata joins in the Objections to the Closing Motion and requests that the Closing Motion be denied to the extent it will prejudice Tata's rights in its defense of its pending adversary proceeding.

Dated: New York, New York
July 19, 2013

KELLEY DRYE & WARREN LLP

By: Gilbert R. Saydah Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of July 2013, I caused the foregoing
*JOINDER OF TATA AMERICA INTERNATIONAL CORPORATION D/B/A TCS AMERICA TO
THE LIMITED OBJECTIONS TO MOTION FOR FINAL DECREE AND ORDER PURSUANT
TO 11 U.S.C. §§ 105, 350(a), AND 1142, FED. R. BANKR. P. 3022, AND LOCAL BANKR. R.
3022-1 CLOSING THE BANKRUPTCY CASES AND PROVIDING RELATED RELIEF* to be
filed and served via this Court's CM/ECF System.

/s/ Gilbert R. Saydah Jr.
Gilbert R. Saydah Jr.